

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF SARA GLEBE

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Sara Glebe, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am a Queer Youth Services Manager for Northwest Youth Services. I have
5 served in this role for the past six months and was previously the Queer Youth Services
6 Coordinator (a position I now supervise). When I started working for Northwest Youth Services
7 in 2022, I first worked as an overnight worker at an emergency winter shelter, and then worked
8 as a housing case manager. I am currently taking classes to obtain a masters-level certification
9 in gender diversity and youth.

10 3. I am transgender. So in addition to my professional experience, I have personal
11 experience navigating resources, including gender-affirming care.

12 4. In my current role, I provide direct services to queer youth in the community and
13 engage in outreach. I provide trans youth with referrals to access medical care. This includes
14 referrals to primary care providers, mental health providers, and providers that offer gender-
15 affirming care. I also assist youth with name and gender marker changes on legal documentation,
16 which can include going to appointments with youth, assisting youth to find a notary, sending
17 paperwork in the mail, and even attending court. I go to high schools in the community to explain
18 the services we offer, get feedback on what youth are experiencing in schools, and assess what
19 queer youth need to thrive in their schools. I also train local community organizations and
20 parents, teachers, and other groups on how to provide support for queer youth, including how to
21 use appropriate terminology in documents and how to create youth groups. Finally, I coordinate
22 youth support groups and safe meeting spaces for queer youth, such as arts and crafts or movie
23 nights. I also maintain a “trans fashion treasury”—a large clothing closet filled with all sorts of
24 items, including gender-affirming items like binders and wigs. We can also provide funds for
25 youth to purchase things they need.
26

1 5. Northwest Youth Services provides assistance to unhoused or at-risk youth who
 2 are trying to access secure housing in Whatcom and Skagit Counties. Apart from age and
 3 location, we do not have any restrictions on who we can serve. Our mission is to affirm youth
 4 experience and autonomy, as we work together to foster collective healing and justice, in order
 5 to dismantle the systems of oppression that perpetuate youth homelessness. Our vision, which is
 6 guided by our core values and commitment to becoming an Anti-Racist organization, is a
 7 community in which all young people are seen as catalysts in creating a just and liberated society
 8 that supports each of our unique journeys through life.

9 6. Within Northwest Youth Services, Queer Youth Services serves queer youth
 10 between the ages of 13 and 24. While many of these youth are housing insecure, we also see
 11 queer youth who are housed. Some people come to us through their work with Northwest Youth
 12 Services to find housing, but others find us through word of mouth or our outreach efforts.

13 7. Trans youth in our community are marginalized and often discriminated against.
 14 I know this from my own personal experience as well as anecdotally from visiting high schools
 15 and queer youth clubs in the community. Trans youth are often outcasted in school. They don't
 16 have a consistent place to go to the bathroom. I've heard that posters for queer clubs have been
 17 ripped down by other students. I have also heard of individual incidents where trans youth are
 18 targeted. Overall, trans youth in Whatcom and Skagit counties do not feel like they have a safe
 19 space to be themselves. Queer Youth Services tries to provide this space for them.

20 8. I understand that the President of the United States has issued an Executive Order
 21 restricting access to gender-affirming care for trans youth. My first reaction after reading the
 22 Executive Order was that it is confusing and potentially very broad. The terminology used in the
 23 Order—like the term “mutilation” being used to describe medical care—is offensive, upsetting,
 24 and very concerning. I worry that this will be further used to vilify parents who try to do their
 25 best to support their trans kids by seeking gender-affirming care. I was also surprised to see that
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1 the Order extends to adults up to the age of 19, which means it impacts legal adults once they
2 turn 18.

3 9. It is also unclear to me what gender-affirming care is targeted by this Order. Trans
4 youth are not the only people who might take hormone therapy. This type of medical care is also
5 available for reproductive care. I am concerned that this Executive Order is so broad it could
6 even cover contraception like hormonal birth control pills or intrauterine devices.

7 10. I am also concerned about medical providers in Washington and what this Order
8 means for them. Washington has a well-renowned gender-affirming care clinic, and a lot of
9 parents go there with their children. I'm concerned that clinic will no longer be an option for
10 these families.


11 11. Youth in my community are scared and confused. They don't understand what
12 the Executive Order means and they are fearful of losing access to care they really need. It is
13 already difficult to access gender-affirming care. There are many youth already who want it and
14 can't access it because they don't have parental support, don't have access to health insurance,
15 don't have stable housing, or don't have transportation to reach medical clinics and pharmacies.

16 12. Parents of queer youth are also concerned. They are worried about what will
17 happen to their children if gender-affirming care is stopped. They are also worried about the
18 government targeting them for simply trying to do what is best for their kids.

19 13. If youth cannot get the gender-affirming care they need, it will have terrible
20 consequences. There will be high levels of distress, and youth will experience higher levels of
21 resentment. This can cause behavioral difficulties and strain on families. It will lead to higher
22 rates of suicide. Youth will have a harder time finding employment, making connections with
23 others, building community, and a harder time with almost everything we measure as an aspect
24 of health and wellness. Gender-affirming care is life-saving care.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 4th day of February 2025, at Bellingham, Washington.

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6 SARA GLEBE
7 Queer Youth Services Manager, Northwest Youth
8 Services
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